

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Intervenor/Plaintiff.

**PLAINTIFFS' CROSS-EXAM EXHIBIT LIST
FOR AUGUST 12, 2025 HEARING**

On Monday August 4, 2025, Defendants Kristi Noem, in her official capacity as Secretary of the United States Department of Homeland Security and Todd Lyons, in his official capacity as Acting Director of the United States Immigration And Customs Enforcement (the “Federal Defendants”) and Kevin Guthrie, in his official capacity as Executive Director of the

Florida Division of Emergency Management (“FDEM”) disclosed three witnesses they intend to call in this matter. Plaintiffs, through undersigned counsel, hereby file a list of additional exhibits that they may use during cross-examination when the Injunction Hearing resumes on August 12, 2025 given the Federal Defendants and FDEM’s witness disclosure. Plaintiffs reserve the right to add exhibits depending on the substance of the witnesses’ testimony, and to provide rebuttal evidence:

CROSS-EXAM EXHIBIT LIST

98	Florida State of Emergency Response Team (SERT) South Florida Detention Facility Continuity of Operations Plan	
99	Resume of Mike Radford, PE (SEC Engineers, Dillon Reio’s colleague)	
100	2015.05.18 Miami-Dade County, Miami International Airport – Miami Dade Aviation Department – Operational Directive No. 15-02, effective June 2, 2025 (Purpose: To establish policy and procedures regarding the use of the Dade-Collier Training & Transition Airport (TNT))	
101	Noem image – “over 10 miles of Everglades on all sides of facility” IMG_1076	
102	“Operations at [the Facility] are ongoing and deportations continuing,” @GovRonDesantis, X (8/7/25 4:53 P.M.)	
103	Photographs of new fencing on access road	
104	August 7, 2025 Statement of Miami-Dade County Mayor Daniella Levine Cava	
105	Link to July 25, 2025 press conference, “Deportation flights from Florida’s ‘Alligator Alcatraz’ detention center have begun, DeSantis says,” https://www.wilx.com/2025/07/25/deportation-flights-floridas-alligator-alcatraz-detention-center-have-begun-desantis-says/	
106	Stephen Miller, White House Deputy Chief of Staff for Policy and Homeland Security Advisor, July 16, 2025 Fox News interview, https://url.us.m.mimecastprotect.com/s/fPTWC68pgltYMk4fpfYi5iUWc?domain=x.com	
107	SERT Order No. PO-010162 (\$1,180,000) IRG Global EM	
108	SERT Order No. PO-010177 (\$325,800) Innovative EM	
109	PO-010174 (\$380,000) AC Disaster	
110	SERT Order No. PO-010181 (\$25,594) Trulight LLC	
111	SERT Order No. PO-010182 (\$15,699.35) CDW Government	

112	SERT Order No. PO-010183 (\$3,358,700) Granny's Alliance	
113	SERT Order No. PO-010201 (\$24,740) WeatherSTEM Inc.	
114	SERT Order No. PO-010199 (\$848,420.22) Public Safety Solutions	
115	SERT Order No. PO-010200 (\$47,730) Williams Communications	
116	SERT Order No. PO-010198 (\$52,010) Lemoine CDE Logistics	
117	SERT Order No. PO-010197 (\$18,178,796.27) Lemoine CDE Logistics	
118	SERT Order No. PO-010195 (\$2,905,740) TNT Transportation	
119	SERT Order No. PO-010196 (\$2,248,540) IRG Global Emergency	
120	SERT Order No. PO-010307 (\$259,012) Will-Burt Integration & Elevation	
121	SERT Order No. PO-010306 (\$499,869.60) Baker's Communications	
122	SERT Order No. PO-010305 (\$245,141.04) Williams Communications	
123	SERT Order No. PO-010304 (\$27,865) Motorola Solutions, Inc.	
124	SERT Order No. PO-010303 (\$2,192) Motorola Solutions, Inc.	
125	SERT Order No. PO-010302 (\$128,132.40) CDW Government LLC	
126	SERT Order No. PO-010326 (\$36,848,875) LTS, Inc.	
127	Photo of black temporary silt fencing - 2025-07-25	
128	FDHSMV Facebook Post, April 9, 2025 https://www.facebook.com/FLHSMV/posts/today-the-florida-highway-patrol-reaches-a-new-milestone-as-executive-director-d/1065884665572211/	
129	Miami Herald, <i>Exclusive: Hundreds at Alligator Alcatraz Have No Criminal Charges</i> , Miami Herald Learns, July 3, 2025, https://www.miamiherald.com/news/local/immigration/article310541810.html	
130	Miami Herald, <i>Is your family member or client at Alligator Alcatraz? We obtained a list</i> , https://www.miamiherald.com/news/local/immigration/article310541770.html#storylink=cpy	
131	Outside Everglades Detention Center by Carrie Feit Portraits	
132	Carrie Feit Photo Declaration	
133	LinkedIn page for Ian-Paul Gadea-Guidicelli, MPA, CEM, FPEM	
134	Homeland Security "Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain – Dormitory Construction at Immigration and Customs Enforcement Krome Service Processing Center – Miami, Florida	
135	Texts from Israel O. Herrera, ICE Assistant Field Officer to FDEM re Standards and Compliance Tour Scheduling.	

136	Ralph Arwood - 08-08-2025 KTNT 06	
137	Ralph Arwood - 08-08-2025 KTNT 15	
138	Ralph Arwood -08-08-2025 KTNT 17	
139	Ralph Arwood - 08-08-2025 KTNT 82	
140	Ralph Arwood - 08-08-2025 KTNT 76	
141	Ralph Arwood - 08-08-2025 KTNT 79	
142	Ralph Arwood - 08-08-2025 KTNT 09	
143	08.08.2025 Brian Mast letter to Jessica Namath	
144	08.08.2025 Declaration of Cooper Kass	
145	Ralph Arwood - 08-08-2025 KTNT (Video)	

Dated: August 8, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 8, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

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